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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAMUEL L. JONES JR.,

Plaintiff,

-against-

No. 07 Civ. 5693 (BSJ/AJP)

INFINITY BROADCASTING CORPORATION
OF WASHINGTON, D.C. n/k/a CBS RADIO INC.
OF WASHINGTON, D.C.,

DECLARATION OF
STANLEY G. RICHARDS

Defendant.

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INFINITY BROADCASTING CORPORATION
OF WASHINGTON, D.C. n/k/a CBS RADIO INC.
OF WASHINGTON, D.C.,

Counterclaimant and Third-Party Plaintiff,

-against-

SAMUEL L. JONES JR.,

Counterclaim Defendant, and

RADIO ONE, INC.

Third-Party Defendant.
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STANLEY G. RICHARDS hereby declares as follows:

1. I am the President of The Richards Group ("TRG") an event planning group, and Positive Black Men Coalition ("PBMC"), an entertainment organization that, for the past thirteen years, has provided upscale entertainment events in the Washington, D.C. metropolitan area. See <http://www.positiveblackmencoalition.com>. It is PBMC's mission to provide an upscale social environment where mature adults can enjoy R&B, jazz, and old style music, as well as live entertainment. At such events, TRG and PBMC select a charitable organization and donate a portion of the proceeds to such organization.

2. Approximately six months ago, I, together with Everestus Thomas, manager of several entertainers, including Samuel L. Jones Jr. p/k/a Huggy Lowdown, made arrangements to book the Hyatt Regency Theatre in Crystal City, Virginia, a suburb of Washington, D.C., for a comedy show to be headlined by Huggy Lowdown. As part of such arrangement, we signed a contract with the venue, and a deposit was made.

3. Typically, during the 3-week period prior to a live show, an extensive promotional campaign is run. The "Huggy Lowdown Comedy Throwdown" ("Comedy Show") is scheduled for Saturday, September 8, 2007 at the Hyatt Regency Crystal City. The promotional campaign, which should begin by August 11, 2007, consists of flyers, newspaper advertisements and, most importantly, radio promotions.

4. On August 2, 2007, I requested my assistant to contact WPGC -- which I understand is affiliated with CBS Radio -- to place such paid advertisements on such station. WPGC and WMMJ (operated by Radio One) are, in my experience, the only two radio stations in metropolitan Washington capable of reaching our intended

audience. Without a radio promotion on either or both of WPGC and WMMJ, the event will likely be a financial fiasco. We will not hereafter promote or sponsor personal appearances by Huggy Lowdown if such appearances cannot be promoted on WPGC or WMMJ.

5. WPGC declined to accept our paid advertisements. *See* the exchange of e-mails attached at Exhibit 1 hereto.

6. After WPGC declined to accept our promotional materials, I then requested Mr. Thomas to contact Radio One to determine if Radio One would promote the Comedy Show scheduled for September 8. The promos on Radio One for such show would consist of the following:

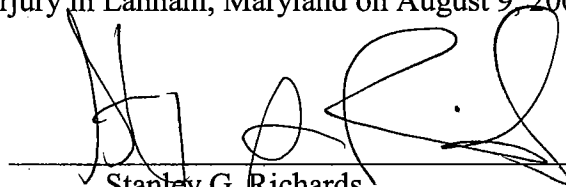
- promos for the actual show and after-party, including “winning tickets” to the Comedy Show;
- mentions -- “come see Huggy Lowdown at the Hyatt Regency Crystal City”;
- sound bites of Huggy doing jokes - which would not contain reference to either the name Huggy Lowdown or reference to (or the voice of) any other person, such as Tom Joyner.

7. As Mr. Thomas and Mr. Rivera explain in their accompanying Declarations, CBS Radio, when asked by Radio One’s or Mr. Jones’ representative for its views on the propriety of such promotions, “reserve[d] [its] rights to enforce the injunction.” As matters now stand, such response leaves Radio One and, thus, my organization, in a state of limbo. If Radio One airs the promotions, it may be subject to “enforcement” proceedings. Without such radio promotion, the long-scheduled Comedy

Show at The Hyatt Regency in Crystal City will most certainly be a financial debacle, and personal appearances by Huggy Lowdown -- at least those sponsored by my organization -- will be at an end.

I declare under penalty of perjury that the foregoing is true and correct.

Executed under penalty of perjury in Lanham, Maryland on August 9, 2007.



Stanley G. Richards